

**From:** David Page <dpage@mkblaw.net>  
**Sent:** Saturday, September 2, 2006 9:30 AM  
**To:** Richard Bishop <rcbishop@wisc.edu>  
**Cc:** David Chapman <DChapman@stratusconsulting.com>  
**Subject:** RE: More on Economics

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Thanks, Rich for the materials and for the context and focus you added in your email... very helpful. David.

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-----Original Message-----

From: Richard C. Bishop [mailto:rcbishop@wisc.edu]  
Sent: Friday, September 01, 2006 5:30 PM  
To: David Page  
Cc: David Chapman" <  
Subject: More on Economics

David, it was good to talk with you this morning. I decided to add a bit to

what David Chapman sent you recently on stated preference methods including

contingent valuation. As we talked in the van during our recent trip, you

mentioned that it would be helpful if I could point you toward specific references within some of the more general documents we would send you.

The DOI guidelines for damage assessment that David C. sent (CERCLA NRDA Regs.pdf) do not go into much detail. On p. 86, they simply say, (vii) Contingent valuation methodology--(A) The contingent valuation methodology includes all techniques that set up hypothetical markets to elicit an individual's economic valuation of a natural resource. This methodology can determine use values and explicitly determine option and existence values. This methodology may be used to determine lost use values of injured natural resources.

[59 FR 14286, Mar. 25, 1994]

(B) The use of the contingent valuation methodology to explicitly estimate

option and existence values should be used only if the authorized official

determines that no use values can be determined.

We have never known quite what Part B means or why it's in there. Why should being able to measure use values rule out option and existence values

(i.e., nonuse or passive use values)? But I thought you should know it's



EXHIBIT B

there.

In the OPA rules that David C. sent, see particularly "valuation approach"

on p. 453. See also the discussion of contingent valuation, conjoint analysis, and benefits transfer starting on p. 469 (p. 31 as the pdf file

measures pages). Don't miss the "response" in the third column of p. 470-471, since it addresses reliability of contingent valuation as well as

conjoint and benefits transfer. Contingent valuation is also mentioned briefly in Appendix B, p. 499.

David C. also sent you the Report of the NOAA Panel, which you may want to

read completely through.

Here I have attached more stuff for your reading pleasure. First, I promised to send you USEPA's take on the usefulness of stated preference methods. The version I have is from 2000, but to my knowledge, it hasn't

been revised so I think this is the latest word. Start on p. 83.

David also sent you one web address for OMB guidance on economic analysis.

You can find brief reference to contingent valuation in Section III.B.4.

A

more detailed and up-to-date treatment is given in OMB Circular No. A-4, which is attached. You might start skimming for context on p. 18, and stated preference methods are addressed in some detail beginning on p. 22.

It is important to take OMB seriously. Under a number of Executive Orders

starting with Reagan, most federal agencies are required to do regulatory

impact assessments on actions with significant economic impacts including

benefit-cost analyses. OMB writes to rules for how these are to be done and

thus swing a big stick in this area.

More soon.

--Rich

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